

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

**DARRYL ANDERSON, HORRIS)
ANDREWS, OLIVIA BRACKINS,)
GUYZARICK CARSAR FRAZIER,)
DEANNA JACKSON, HARRY LETT,)
ANGELA M. WILLIAMS, SHANETHA)
R. ADAMS, KATINA BINION,)
NORLINE BLACK, GENEVA BYNUM,)
ANTHONY D. DAVIS, VELVERLYN)
ANN GIBSON, VETA GRIFFIN,)
WALTER J. HAMILTON, CLARICE)
HICKS, LAQUNDA KEGLER,)
ROY LEE KING, HORACE LOVE,)
BRITANNICA MCCOY, CAROLYN)
L. MCCOY, DON MURRY, BILLY)
JOE NEWBY, FELISHA SIMON,)
HATTIE N. SMITH, RANDY SOL JR.,)
MICHELLE TILLER, KATRINA)
WARD and ANNIE J. WOODLEY)**

Plaintiffs,

v.

**PERDUE FARMS INCORPORATED,)
a Maryland corporation doing business)
in Alabama,)**

Defendant.

Case Action No.:

1:06-CV-1000-MEF-WC

JURY TRIAL DEMANDED

MOTION FOR ADMISSION PRO HAC VICE

COMES NOW Defendant, **PERDUE FARMS INCORPORATED** ("Perdue"), by and through its counsel, Sandra B. Reiss, and moves this Honorable Court to permit James J. Kelley and Brian Z. Liss to appear as co-counsel in the above-referenced case for

Defendant, Perdue Farms, Incorporated. In support of this motion, this Defendant presents the following facts:

1. James J. Kelley and Brian Z. Liss, practicing lawyers with the firm of Morgan, Lewis & Bockius, LLP, in Washington, D.C., have represented and continue to represent Defendant, Perdue Farms Incorporated, in certain employment matters.

2. James J. Kelley and Brian Z. Liss desire to appear as co-counsel in this case with Sandra B. Reiss, a shareholder in the law firm of Ogletree, Deakins, Nash, Smoak & Stewart, P.C., Birmingham, Alabama, who has already appeared in this matter as counsel of record for Defendant, Perdue Farms, Inc.

3. James J. Kelley is admitted to practice in the District of Columbia Court of Appeals, and remains in good standing. The Affidavit of James J. Kelley is attached as Exhibit "A" in support of this motion.

4. Brian Z. Liss is admitted to practice in the United States District Court for the District of Maryland as well as admitted to practice in the District of Columbia Court of Appeals, as well as other Courts identified in his Affidavit. The Affidavit of Brian Z. Liss is attached as Exhibit "B" in support of this motion.

5. James J. Kelley and Brian Z. Liss agree that, unless permitted to withdraw sooner by order of the Court, they will continue to represent Defendant Perdue in these proceedings until the final determination thereof, and that with reference to all matters incident to these proceedings, they each agree they shall be subject to the orders and amenable to the disciplinary action and civil jurisdiction of the United States District Court,

Middle District of Alabama, and the Alabama State Bar in all respects as if each were a regularly admitted and licensed member of the Bar of Alabama in good standing.

WHEREFORE, Defendant requests an Order from this Court specially admitting James J. Kelley and Brian Z. Liss to serve as co-counsel for the purpose of this litigation.

DATED this 4th day of January, 2007.

Respectfully submitted,

Counsel for Defendant

/s/ Sandra B. Reiss

Sandra B. Reiss, Esq.
ASB-3650-s80s
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
One Federal Place, Suite 1000
1819 5th Avenue North
Birmingham, Alabama 35203
E-mail: Sandra.Reiss@odnss.com
Ph. (205) 328-1900
Fax: (205) 328-6000

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing Motion for Admission Pro Hac Vice has been electronically filed on this **4th day of January, 2007**, using the CM/ECF system which will send a notice of electronic filing as well as the full text of the Motion with Exhibits A and B, to counsel of record, Samuel A. Cherry, Jr., Lance H. Swanner, and Joseph D. Lane, who are confirmed to be individually registered for e-filing and will receive the same electronically from the Court.

s/ Sandra B. Reiss

Sandra B. Reiss, Esq.

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

DARRYL ANDERSON, HORRIS)
ANDREWS, OLIVIA BRACKINS,)
GUYZARICK CARSAR FRAZIER,)
DEANNA JACKSON, HARRY LETT,)
ANGELA M. WILLIAMS, SHANETHA)
R. ADAMS, KATINA BINION,)
NORLINE BLACK, GENEVA BYNUM,)
ANTHONY D. DAVIS, VELVERLYN)
ANN GIBSON, VETA GRIFFIN,)
WALTER J. HAMILTON, CLARICE)
HICKS, LAQUNDA KEGLER,)
ROY LEE KING, HORACE LOVE,)
BRITANNICA MCCOY, CAROLYN)
L. MCCOY, DON MURRY, BILLY)
JOE NEWBY, FELISHA SIMON,)
HATTIE N. SMITH, RANDY SOL JR.,)
MICHELLE TILLER, KATRINA)
WARD and ANNIE J. WOODLEY)

Plaintiffs,

v.

PERDUE FARMS INCORPORATED,
a Maryland corporation doing business
in Alabama,

Defendant.

Case Action No.:

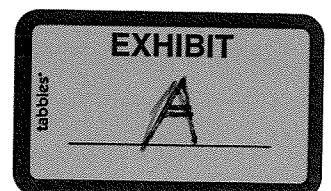
1:06-CV-1000-MEF-WC

JURY TRIAL DEMANDED

AFFIDAVIT OF JAMES J. KELLEY
IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

James J. Kelley having been duly sworn, deposes and states as follows:

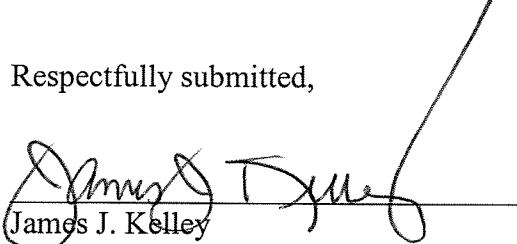
1. I am an attorney with the law firm of Morgan, Lewis & Bockius LLP, which is representing the Defendant Perdue Farms Incorporated, in this case.
2. I am a member in good standing of the Bar of the District of Columbia.



3. I am authorized to practice in and am in good standing with the District of Columbia Court of Appeals. A Certificate of Good Standing is attached hereto as "Exhibit A."
4. I am familiar with all rules and regulations governing proceedings in federal court, and certify that I have read and am familiar with the Uniform Local Rules of the United States District Court for the Middle District of Alabama.
5. I certify that I have studied the local rules and agree that, unless permitted to withdraw sooner by order of the Court, will continue to represent the Defendant Perdue in these proceedings until the final determination thereof.
6. I understand that, with reference to all matters incident to these proceedings, I will be deemed to have conferred disciplinary jurisdiction upon this Court for any alleged misconduct arising in the course of, or in preparation for, proceedings in this case.

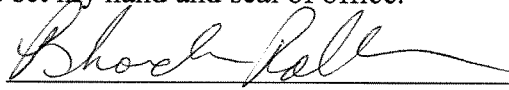
Dated: 2nd day of January, 2007.

Respectfully submitted,


James J. Kelley
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Telephone: 202-739-5095
Telecopier: 202-739-3001

ATTORNEY FOR PERDUE FARMS INC.

SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned authority, on this 2nd day of January, 2007, to certify which I have set my hand and seal of office.



Notary Public in and for the
District of Columbia

My commission expires:

RHONDA D. ROLLERSON
NOTARY PUBLIC DISTRICT OF COLUMBIA
MY COMMISSION EXPIRES 2/14/2010



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710


I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

JAMES J. KELLEY

was on the 20TH day of AUGUST, 1974
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on
December 22, 2006.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

DARRYL ANDERSON, HORRIS)
ANDREWS, OLIVIA BRACKINS,)
GUYZARICK CARSAR FRAZIER,)
DEANNA JACKSON, HARRY LETT,)
ANGELA M. WILLIAMS, SHANETHA)
R. ADAMS, KATINA BINION,)
NORLINE BLACK, GENEVA BYNUM,)
ANTHONY D. DAVIS, VELVERLYN)
ANN GIBSON, VETA GRIFFIN,)
WALTER J. HAMILTON, CLARICE)
HICKS, LAQUNDA KEGLER,)
ROY LEE KING, HORACE LOVE,)
BRITANNICA MCCOY, CAROLYN)
L. MCCOY, DON MURRY, BILLY)
JOE NEWBY, FELISHA SIMON,)
HATTIE N. SMITH, RANDY SOL JR.,)
MICHELLE TILLER, KATRINA)
WARD and ANNIE J. WOODLEY)

Plaintiffs,

v.

PERDUE FARMS INCORPORATED,
a Maryland corporation doing business
in Alabama,

Defendant.

Case Action No.:

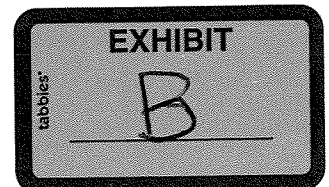
1:06-CV-1000-MEF-WC

JURY TRIAL DEMANDED

AFFIDAVIT OF BRIAN Z. LISS
IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

Brian Z. Liss having been duly sworn, deposes and states as follows:

1. I am an attorney with the law firm of Morgan, Lewis & Bockius LLP, which is representing the Defendant Perdue Farms Incorporated, in this case.

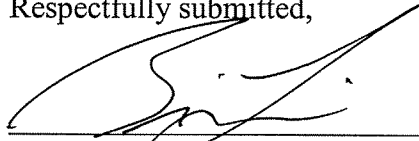


2. I am a member in good standing of the State of Maryland Bar and the Bar of the District of Columbia.
3. I am authorized to practice in and am in good standing with the District of Columbia Court of Appeals and United States District Court for the District of Maryland.

Certificates of Good Standing are attached hereto as "Exhibit A." I am also admitted to practice in the United States Court of Appeals for the Fourth Circuit, the Northern District of Indiana, and the Eastern District of Michigan.
4. I am familiar with all rules and regulations governing proceedings in federal court, and certify that I have read and am familiar with the Uniform Local Rules of the United States District Court for the Middle District of Alabama.
5. I certify that I have studied the local rules and agree that, unless permitted to withdraw sooner by order of the Court, will continue to represent the Defendant Perdue Farms, Inc., in these proceedings until the final determination thereof.
6. I understand that, with reference to all matters incident to these proceedings, I will be deemed to have conferred disciplinary jurisdiction upon this Court for any alleged misconduct arising in the course of, or in preparation for, proceedings in this case.

Dated: 2nd day of January, 2007.

Respectfully submitted,

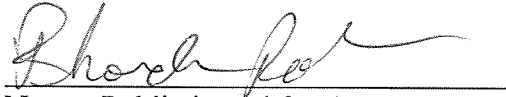


Brian Z. Liss

MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Telephone: 202-739-5579
Facsimile: 202-739-3001

ATTORNEY FOR PERDUE FARMS, INC.

SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned authority, on this 2nd day of January, 2007, to certify which I have set my hand and seal of office.

A handwritten signature in cursive script, appearing to read "Rhonda D. Rollerson", written over a horizontal line.

Notary Public in and for the
District of Columbia

My commission expires:

RHONDA D. ROLLERSON
NOTARY PUBLIC DISTRICT OF COLUMBIA
MY COMMISSION EXPIRES 2/14/2010



Certificate of Good Standing

UNITED STATES OF AMERICA

DISTRICT OF MARYLAND

**I, Felicia C. Cannon, Clerk of the United States District Court for the District
of Maryland,**

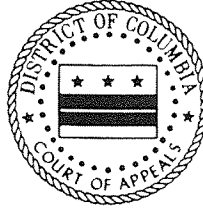
**DO HEREBY CERTIFY that, BRIAN Z. LISS, ESQUIRE,
BAR NUMBER 15463, was duly admitted to practice in the United States
District Court for the District of Maryland on July 15, 2002, and is currently in
good standing as a member of the bar of this Court.**

Dated at Baltimore, Maryland

FELICIA C. CANNON
Clerk

Date: December 22, 2006


Tina Stavrou - Deputy Clerk



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

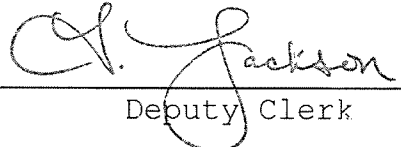
I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

BRIAN Z. LISS

was on the 4TH day of AUGUST, 2000
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on
December 22, 2006.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk